

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PANJI WEAVING CO., LTD.,

Plaintiff,

v.

**THE ENTITIES AND INDIVIDUALS
IDENTIFIED IN ANNEX “A”**

Defendants.

Civil Action No.: 24-cv-01556

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, Panji Weaving Co., Ltd. (“Plaintiff”), files this Motion for Leave to File the following documents under seal: (1) Plaintiff’s Amended Complaint, and any and all Exhibits and Declarations submitted with or attached to the Amended Complaint, including those which lists Defendants’ platform, store URL, store name, store evidence, infringing evidence, and Seller Aliases; (2) Annex “A” attached to the Amended Complaint; (3) Plaintiff’s *Ex Parte* Motion for Entry of a Temporary Restraining Order (“TRO”), including a temporary injunction, temporary asset restraint, and expedited discovery, and any and all Exhibits and Declarations submitted with or attached to the *Ex Parte* Motion for Entry of a TRO; (4) Plaintiff’s Memorandum in Support of Entry of a TRO, including a temporary injunction, temporary asset restraint, and expedited discovery, and any and all Exhibits and Declarations submitted with or attached to the Memorandum in Support of Entry of a TRO; (5) Plaintiff’s Motion for Alternative Service, and any and all Exhibits and Declarations submitted with or attached to the Motion for Alternative Service; and (6) Plaintiff’s Memorandum in Support of Motion for Alternative Service, and any

and all Exhibits and Declarations submitted with or attached to the Memorandum in Support of Motion for Alternative Service.

These documents identify the individual Defendants in this case via their online Seller Alias names and contain certain Plaintiff's copyrighted related information. Upon information and belief, Defendants operate numerous Amazon.com and other online platform Seller Aliases for the sole purpose of selling and offering for sale infringing goods, including goods infringing Plaintiff's Copyright. Given the nature of the online platform, which allows overseas Defendants to operate anonymously, Plaintiff is also filing—concurrently with this Motion—a motion for temporary *ex parte* restraining order enjoining the Defendants from infringing Plaintiff's Copyright. As such, Plaintiff believes sealing these portions of the Complaint and other documents which identify the Amazon.com and other online platform Seller Aliases is necessary to prevent Defendants from simply closing their current account and opening accounts under a different name or even on a different platform, thereby frustrating the entire purpose of the law, Plaintiff's attempts to protect its copyright rights, and the powers of this Court. Once the Court has entered and Defendants have been served with the requested temporary restraining order, Plaintiff will move to unseal these documents.

DATED February 26, 2024

Respectfully submitted,

/s/ Ge (Linda) Lei
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